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December 14, 2021

Sent via ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: U.S. v. David Pagan-Lopez, et al., 21 Cr. 00640 (PKC)

Dear Judge Castel:

I represent Saul Dorta-Hernandez pursuant to the Criminal Justice Act (CJA) in the above-captioned matter. [I write to respectfully request the Court appoint Thomas Dunn as co-counsel to assist me in this matter as the government has advised that it intends to produce voluminous discovery, over 16 TB of materials, in the next few months.] Mr. Dunn and I have tried multiple cases together and I expect that Mr. Dunn's involvement in this case will substantially assist in providing the best defense team to Mr. Dorta-Hernandez. I further request that Mr. Dunn receive the standard CJA rate of \$155 for appointed counsel as he has been a member of the SDNY, EDNY, and DNJ Panels for over 20 years.

For the Court's convenience, I have included a "So Ordered" line should the Court grant our request. Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro

cc: All Counsel of Record (via ECF)

Application GRANTED

SO ORDERED

Honorable P. Kevin Castel, U.S.D.J.

12-15-21